

"acceptable" picture? What picture grading scale or assessment criteria would be used by the subscriber to evaluate picture quality? Equally important, what grading scale or assessment criteria would be used by the "evaluator" to determine whether a "reasonable person" would find the picture "acceptable," and, thus, whether the subscriber might have committed perjury and whether satellite delivery of broadcast network programming to that subscriber would be permissible?

Would a single evaluator be sufficient or would (as accepted engineering practice dictates) a panel of evaluators be required? What if the parties could not agree on the selection of an evaluator or evaluators? Would a federal district court then make the selection? What sanctions would be imposed for failure of one of the parties to select evaluator(s)? Would the party who failed to cooperate in good faith in the selection of evaluator(s) be required to pay court costs and reimburse the other party's attorney fees for having to go to federal court to get the evaluator(s) appointed?

A critically important issue is whether the evaluation would have to be completed and all disputes resolved *before* satellite service is commenced? If not, satellite carriers would have every incentive to authorize service, drag their feet, refuse to cooperate and require the affiliate to sue to compel the carrier to cooperate--and all the while collect subscriber fees. What disincentives for abuse of process by satellite carriers should be enacted?

Would evaluator(s) use the subscriber's existing television set, transmission line and outdoor antenna to take the "snapshot"? What if any part or all of the subscriber's TV set, transmission line or antenna were defective? Who decides if they are? If so, who then pays for the evaluation--the subscriber or the satellite carrier? What assurance is there that appropriate, uniform technical

standards would be applied to certify that the subscriber's TV equipment is working properly? What if the subscriber did not have a rooftop antenna--or had it pointed in the wrong direction? Who would pay for the evaluation in that case--the subscriber or the satellite carrier?

What technical standards would be prescribed for the testing and recording equipment used by the evaluator(s)? Who would establish those standards and the viewing conditions and standards by which the picture is to be evaluated?

Would the decision of the evaluator(s) be subject to judicial review? Surely the right of either party to judicial review could not be compromised. It is inconceivable that the administration of the nation's copyright law would be left to third parties without the right of judicial review. Basic notions of due process for all parties--broadcasters and satellite carriers alike--require no less.

Upon judicial review, how many federal judges would be required to sit as a panel of observers to evaluate the soundness of the equipment and test procedures and make a "subjective" assessment of the *subjective assessment* made by the evaluator(s) of picture quality.

Thus, while PrimeTime 24's proposal may at first blush seem simple, it is not. It would be more cumbersome and expensive for the parties and the courts to administer and the results significantly less reliable than the existing objective Grade B standard. Perhaps that is why no other satellite carrier has endorsed it.

Exhibit D, which is attached, contains an engineering statement prepared by the respected communications consulting engineering firm, duTreil, Lundin & Rackley, Inc. The duTreil statement explains the relationship of the Grade B standard to picture quality. The statement points out that in formulating the Grade B standard, the Commission utilized the TASO picture quality

grading scale and determined that, under that scale, a signal of Grade B intensity equates to a "passable" or "acceptable" picture. The result is that the Grade B standard is an objective tool or proxy developed by the FCC for measuring picture quality.<sup>44</sup> It is wrong to suggest, as PrimeTime 24 does, that the Grade B standard has no or little relevance to picture quality.

For a signal to qualify as a "Grade B," it must achieve a specified dBu level. That level varies depending on the specific channel on which the station is operating. For Channels 2 - 6, for example, the minimum Grade B level would be 47 dBu's; for Channels 7 - 13, 56 dBu's; and for Channels 14 - 69, 64 dBu's.<sup>45</sup>

The duTreil statement notes that the greater the signal strength, the better the picture. It states that interference, i.e. "noise," (some of which is under the control of the homeowner) may in some circumstances adversely affect the picture quality of VHF stations, principally those operating in the high-band channels. Noise and interference, however, do not adversely affect the picture quality of stations operating on UHF channels. Even in the case of VHF stations, interference is more likely to be present in urban areas--not in rural areas--where the signal strength of local stations is likely to be much in excess of the Grade B level and thus sufficiently strong to overcome the interference and its potential adverse effect on picture quality.

The duTreil statement points out that where terrain obstructions may create ghosting, conventional TV receiving antenna and equipment are available to largely eliminate the problem:

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<sup>44</sup>Engineering Statement of duTreil, Lundin & Rackley, Inc., Exhibit D.

<sup>45</sup>*Id.* at p. 2.

"What is known as television picture 'ghosting,' is the result of multipath, or multiple signals arriving at the receiver at different times. This effect can occur on all television channels. In many cases, the 'ghosting' effect can be reduced or eliminated through the use of an improved antenna with a high front-to-back ratio. That is, because the reflected signals often arrive at different angles off the receive antenna than from the main beam of the antenna, an antenna with a high front-to-back ratio can be used to attenuate, or reduce, the level of reflected signals while preserving the desired signal. Commonly available log-periodic antennas are known for their high front-to-back ratio. A UHF 'bow-tie' antenna with a wire-grid reflector is another good example of a UHF antenna with a high front-to-back ratio."<sup>46</sup>

Attached to the duTreil statement is the current methodology recommended by the International Telecommunications Union ("ITU") for conducting subjective television picture quality assessments. The ITU formulates and recommends telecommunications standards both for governments and the private sector, and those standards are highly regarded throughout the world.

The ITU requires that "at least 15 observers" be used to grade and evaluate a picture when applying the TASO standards. Under ITU requirements, these observers must be neither "expert" nor "experienced" in the task of assessing picture quality. The ITU recommendations state that each of the 15 observers must be "screened for (corrected-to-) normal visual acuity" and for "normal colour vision." The ITU rules specify, among other things, the distance each observer must be from the picture, lighting conditions, the kind of pictures to be evaluated, the equipment to be used and the length of each viewing session. The ITU recommendations also note that different standards may be required in assessing HDTV and enhanced television transmissions.

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<sup>46</sup>*Id.* at pp. 6 - 7.

Here's an illustrative example of one of the ITU recommendations on how a "test session" should be conducted:

"2.7 The test session

a session should last up to half an hour. At the beginning of the first session, about five 'dummy presentations' should be introduced to stabilize the observer's opinion. The data issues from these presentations must not be taken into account in the results of the test."

If a subjective picture quality standard should be enacted, how should a federal judge in a Section 119 infringement action instruct a jury on how to apply the subjective TASO picture rankings? Would a 12 or 6 person jury be sufficient--or would 15 jurors be required? If tried without a jury, would 15 federal judges be required to make the subjective evaluations? Could lawyers for each party require that each judge or juror have an eye exam to determine her or his visual acuity and color perception? Would the judges and the jurors be required to observe each picture from a specified distance, review "dummy presentations" and devote "up to half an hour" observing, in a tightly controlled laboratory environment, pictures taken at *each* subscriber's household? How long would it take to try a Section 119 infringement action if the judges or jurors were required to devote the requisite 30 minutes to evaluate the pictures taken at *each* household where thousands--if not millions--of households are alleged to be in violation? How much would it cost?

Each of these safeguards is required to eliminate personal bias in the application of a subjective picture quality standard. If the ITU safeguards are necessary for use in conventional engineering contexts, surely nothing less would be required in the crucible of a judicial proceeding

involving allegations of copyright infringement in which injunctive relief, money damages, court costs and attorney fees may be awarded.

It is self-evident that a subjective picture quality standard would be cumbersome, if not impossible, to administer--both in terms of the time requirement and inordinate expense imposed on subscribers, the affected industries and the federal courts. In the end, it would paralyze enforcement of the Act. We suspect that is precisely why PrimeTime 24 advocates it.

None of this is new. In a recent case involving a cable television system, one of PrimeTime 24's consulting engineers (Cohen, Dippell and Everist) made a videotape of a station's signal in support of its argument regarding "picture quality." The videotape was submitted to the FCC by the cable company in an attempt to show that the cable TV "head-end" did not receive an acceptable signal from a local station, and, thus, the cable system should not be required to carry the station under the FCC's must-carry rules. The FCC refused to utilize the videotape, rejected the argument that a subjective picture quality standard be applied and utilized, instead, an objective signal strength standard. The Commission stated:

" . . . [W]e will generally not consider photographs, photographs of a videotape, or the videotape itself to establish the presence or absence of a good quality signal for must carry purposes. We believe the videotaping, video playback equipment, television receiver as well as photographic equipment used may interject impairments (e.g., noise, equipment characteristics, color integration, etc.) which could make it difficult to judge whether the videotape or photograph accurately represents the station signal."<sup>47</sup> [Emphasis supplied.]

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<sup>47</sup>*In Re Complaint Of Independence Public Media Of Philadelphia, Inc. Against Suburban Cable TV Co.*, CSR-3806 M, PA 1650, at ¶7.

In conclusion, whatever the imperfections of the objective Grade B standard, they pale in comparison to those inherent in a subjective standard. Perhaps the best evidence that the objective Grade B standard is the only appropriate legal standard and that a pragmatic measurement methodology can be established by parties who share a common commitment to make the Act work, is the fact that the other two satellite providers of broadcast network programming have accepted the Grade B standard, have never advocated any other standard, and have agreed upon a mutually acceptable measurement methodology to determine whether a specific household can or cannot receive a Grade B signal.

The Copyright Office detailed the problems inherent in a subjective signal quality standard when it rejected PrimeTime 24's request to recommend a subjective standard to Congress.<sup>48</sup> The Copyright Office concluded that "the substitution of a picture quality standard for the Grade B standard [would be] too subjective, legally insufficient, and administratively unworkable."<sup>49</sup>

## **VI. The Surcharge Proposal**

DirecTV recommends to the Commission that the "white area" restrictions of the SHVA be repealed and that a government imposed subscriber surcharge be added to the cost of broadcast network service within 35 miles of a local affiliate's city of license and paid to the affiliate for the

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<sup>48</sup>A Report of the Register of Copyrights, "A Review of Copyright Licensing Regimes Covering Retransmission of Broadcast Signals," U.S. Copyright Office, August 1, 1997.

<sup>49</sup>*Id.* at p. XV.

loss of its network program exclusivity. The Copyright Office in its August 1, 1997, Report to Congress on copyright issues proposed (as an interim measure during the transition to digital) a surcharge for all subscribers located within a local affiliate's DMA (not just those within 35 miles). The Copyright Office proposed that the amount of the surcharge would be determined by the Copyright Royalty Tribunal and paid to the affiliate for the loss of its network exclusivity.<sup>50</sup>

The notion of a government mandated surcharge is fundamentally at odds with the principles of a free market and with traditional protections afforded to intellectual property. It is no more appropriate for Congress to impose a mandatory surcharge for the loss of exclusivity for distribution of broadcast television programming than it would be for it to impose a surcharge to compensate copyright holders for the loss of their exclusivity for distribution of printed copyrighted works. It is doubtful that the publishers of "The Washington Post" or "The New York Times," for example, would be supportive of a government mandated surcharge to compensate them for the unauthorized copying distribution and resale of their newspapers. Moreover, if Congress should require broadcast networks to make their network programming available to satellite carriers, what would prevent it from making the same network programming available to other local independent, non-network

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<sup>50</sup>The Copyright Office noted the linkage between cable's compulsory copyright license and the FCC's network non-duplication and syndicated exclusivity rules and suggested those rules should be applied to satellite carriers. The Copyright Office overlooked, however, the direct correlation between cable's compulsory license and the Commission's (and Congress') "must carry" requirements. As noted earlier, "must carry" is a critical element in the equation and to extend network non-duplication and syndex requirements to satellite carriers without extending the "must carry" requirements would be destructive to the existing universally available, free, over-the-air local broadcast service.



broadcast stations in the market or to cable network providers? Clearly, the result in either case would be the destruction of the national network/local affiliate distribution system.

The government should not, in the absence of the most compelling public need, inject itself into the independent free market negotiations concerning the use or reuse of intellectual property. The public interest case for a mandated “taking” by satellite carriers of broadcast network programming has not--indeed cannot--be made. Congress gave satellite carriers a compulsory license--which, itself, was an extraordinary privilege--for the narrow purpose of affording access to broadcast network programming for those located beyond the reach of a local affiliate. Not content with that special government privilege--and not willing to pay as broadcast stations do in an open market for the rights to use network programming--DirecTV is pleading for more. DirecTV's mandatory program access and surcharge proposal is a solution in search of a problem--it should be summarily rejected.

## **VII. Extension Of The Act**

NASA opposes the recommendation of the Satellite Carriers to make the satellite compulsory license permanent for two reasons. First, the transition to digital television, when completed, may change and renew much of the current debate about signal strength and picture quality. Indications are that with a digital signal--unlike an analog signal--the television receiver either receives a perfect signal or no signal at all. For that reason alone, Section 119 should not be extended for more than

five years. The transition to digital will require legislative flexibility to make any adjustments that will become necessary.

Second, as noted earlier, given the record of non-compliance by satellite carriers, there are understandable reservations within the broadcast industry about the wisdom of any extension of Section 119.

### **VIII. In-Market Satellite Delivery Of Local Stations**

In their Comments, DirecTV and SBCA propose that Section 119 of the SHVA be amended to allow in-market delivery of local television stations. DirecTV states that “[u]nlike cable operators, which may distribute [ ] local network affiliate signals . . . DBS providers . . . require a clarification of the law at a minimum in order to offer local network affiliate signals to their subscribers.”<sup>51</sup>

DirecTV's argument contrasts with its public statement about the ease with which satellite subscribers can secure broadcast programming from their local stations.

More important, as noted earlier, cable's compulsory license for the carriage of local stations was linked from the outset with a communications policy regulatory requirement to carry all local television stations. No rational distinction can be made for exempting satellite carriers from a must-

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<sup>51</sup>DirecTV Comments at p.8.

carry requirement. The constitutional and public policy rational for cable's must-carry requirement is applicable with equal force to satellite carriers:

"[I]ncreasing the number of outlets for community self-expression' represents a 'long-established regulatory goal in the field of television broadcasting.' Consistent with this objective, the Cable Act's findings reflect a concern that congressional action was necessary to prevent 'a reduction in the number of media voices available to consumers.' §2(a)(4). Congress identified a specific interest in 'ensuring [the] continuation' of 'the local origination of [broadcast] programming,' §2(a)(10), an interest consistent with its larger purpose of promoting multiple types of media, §2(a)(6), and found must-carry necessary 'to serve the goals' of the original Communications Act of 1934 of 'providing a fair, efficient, and equitable distribution of broadcast services' (§2(a)(9)). In short, Congress enacted must-carry to 'preserve the existing structure of the Nation's broadcast television medium while permitting the concomitant expansion and development of cable television.'" 517 U.S., at 652.<sup>52</sup>

In short, any change made in the copyright statute to extend the compulsory license to satellite companies for in-market carriage of local stations must be accompanied by a corresponding change in the Communications Act to require satellite carriers to carry, as cable systems do, all local television stations.

Other regulatory requirements imposed by Congress and the FCC on cable systems are equally relevant. Among them are the FCC's network non-duplication, syndicated exclusivity, sports black-out and local broadcast station/cable system cross-ownership rules. The former protect the exclusivity that broadcast stations have acquired in their programming. The latter prohibits

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<sup>52</sup>*Turner Broadcasting System, Inc. v. Federal Communications Commission*, Case No. 992, U.S. Supreme Court (Slip Opinion at 8-9) March 31, 1997.

common ownership of broadcast stations and cable systems within the same market. The policy rationale underlying these rules is equally applicable to satellite carriers. NASA has long been supportive of these rules believing them to be essential for fair competition in local television markets. Thus, Congress should require the FCC to extend these rules to satellite carriers if cable's compulsory license is extended to satellite carriers for in-market delivery of local stations.

In addition, NASA is deeply concerned about the extent to which provisions would be enacted to allow affiliates to monitor and enforce compliance by satellite carriers with the deceptive marketing practices and illegal carriage of distant network stations should not be repeated. It is essential that any extension of the satellite industry's compulsory license for in-market carriage of local stations be accompanied by statutory provisions that would enable networks and their affiliates to monitor compliance and readily enforce the limitations of the statutory copyright license. Infringement by satellite carriers should be subject to the same penalties as provided for cable companies under Section 111.

Finally, to the extent any change is made in Section 119's definition of "local market" for purposes of carriage of local stations, care should be taken to assure that the change does not adversely affect the "pattern and practice" remedies for violations as provided for in Section 119. The 1994 amendment defined "local market" as a station's predicted Grade B contour for purposes of proving that violations constitute a "pattern and practice." No change in the definition of "local market" should be made as that term applies to a "pattern and practice" of violations.

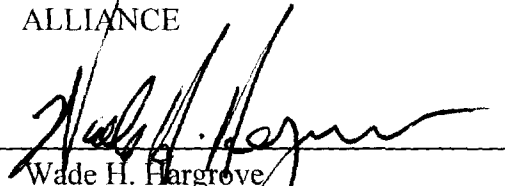
## CONCLUSION

WHEREFORE, the Network Affiliated Stations Alliance recommends that the FCC incorporate in its report to Congress the views and recommendations set forth herein.

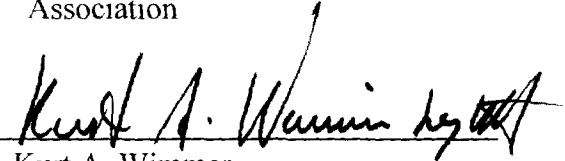
Respectfully submitted,

THE NETWORK AFFILIATED STATIONS  
ALLIANCE

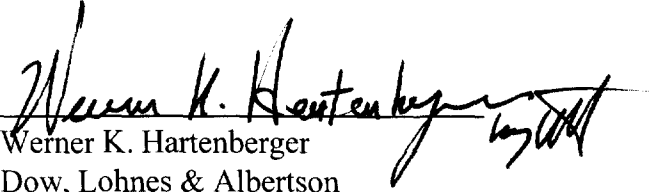
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A handwritten signature in black ink, appearing to read "Werner K. Hartenberger", with a stylized flourish at the end.

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August 20, 1997

**EXHIBIT A**

**DIRECTV/USSB PROMOTIONAL BROCHURE**



**YOU ONLY USE 11% OF ITS POTENTIAL.**



**DITTO.**

**Now there's a way to get  
the most of both.**



## Anything good on?

It may be the most commonly asked question in America each evening. So what if we told you there's a way to unlock the full potential of your television — a way to enjoy all the favorite channels you've had with cable, along with an unprecedented selection of movies, sports and a lot more. All brought to you with the clarity of digital picture and sound. And easy access to your local channels.

This is U.S. Satellite Broadcasting<sup>SM</sup> (USSB<sup>®</sup>) and DIRECTV<sup>®</sup>, available exclusively on the 18" DSS<sup>®</sup> dish. Together, they will redefine how you experience television.



**You've never  
seen movies  
like this.<sup>SM</sup>**

What is U.S. Satellite Broadcasting? The most incredible movie experience on television.

USSB is where you'll find all of the most popular, commercial-free, movie channels, with 5 different channels of HBO<sup>®</sup>, 4 Showtime<sup>®</sup> channels, 3 Cinemax<sup>®</sup> channels, 2 of The Movie Channel<sup>TM</sup>, 2 channels of HBO<sup>®</sup> Family, FLIX<sup>SM</sup> and the Sundance Channel<sup>TM</sup>, premiering the best in independent film under the creative direction of Robert Redford.

Why more than one channel of HBO and Showtime? Multiple channels bring you more movie choices and viewing times to choose from than ever before. And what makes USSB so different is that you get them all in one place.



HBO

MULTICHANNEL  
SHOWTIME

HBO

the movie  
channel  
MULTICHANNEL

HBO  
FAMILY

FLIX

sundance  
CHANNEL

ALL NEWS

ALL NEWS

TV  
ABC

TV  
ABC

M2

1  
HBO

1  
HBO

Lifetime

COMEDY  
CENTRAL

COMEDY  
CENTRAL

With USSB, you'll have your choice of more than 900 different movies per month.

choices a night. And you can order pay-per-view with your remote control.

## How do I find my way around more than 200 channels?

Quickly and easily, with the interactive, on-screen programming guide. With the touch of a button on your DSS remote, you can find out what's on by title, time, and programming genre. You can also find out what's playing a few days in advance, as well as create your own personalized channel lists. There's even a "locks and limits" feature that allows you to control what your children watch and what they spend on pay-per-view.

**U.S. Satellite Broadcasting  
Together — only on the 18" DSS dish —  
home the best selection  
and information in the world.**

## Sports, news and information.

What U.S. Satellite Broadcasting is to movies, DIRECTV is to sports. DIRECTV offers you regular Season Ticket packages that let you see thousands of pro and college games from all over the country. And you'll have all the Regional Sports Networks to choose from.

You'll also see the widest selection of news, information, and as many as 55 different pay-per-view movie



ESPN

ESPN

ESPN

ESPN

ESPN

ESPN

CNN

CNN

TNT

USA  
NETWORK

WGN  
CHICAGO

TBS  
SUPERSTATION

ESPN

ESPN

ESPN

ESPN

ESPN



These are only a few of the services that you'll find on DIRECTV.

## TV has never looked or sounded so good.

What makes the DSS system unique? Digital technology. It's the difference between listening to a CD versus an old record. The picture and sound quality are unlike anything you've experienced. And on top of that, digital technology is the wave of the future.

### Easy access to local channels.

Contrary to what your local cable company may tell you, the DSS system has always



## What now?

Hopefully, reading this brochure has increased your brain capacity. So what now? Look at the back of this brochure and find answers to the most commonly asked questions about the

DSS system. Use them to help you when talking with a sales person at your local electronics or satellite retailer.

You'll even find a retailer near you.

Then go and experience the DSS difference for yourself. And remember to ask about your Free Month of USSB – a 30-day free trial of all USSB channels.

## The ABCs of the DSS dish.

The DSS system is a fundamental improvement in the choice and quality that television provides.

By subscribing to both USSB and DIRECTV, you'll have over 200 channels to choose from.



The best commercial-free, multichannel movie channels available, like HBO, Showtime, Cinemax, The Movie Channel, FLIX, HBO Family, and Sundance Channel.

As many as 55 different pay-per-view movie choices a night



An unprecedented selection of pro and college sports packages from the NFL, NBA, NHL, Major League Baseball, Major League Soccer, ESPN, and Regional Sports Networks. And the world's best boxing on Showtime and HBO.

The most popular basic networks.

31 commercial-free CD audio music channels.

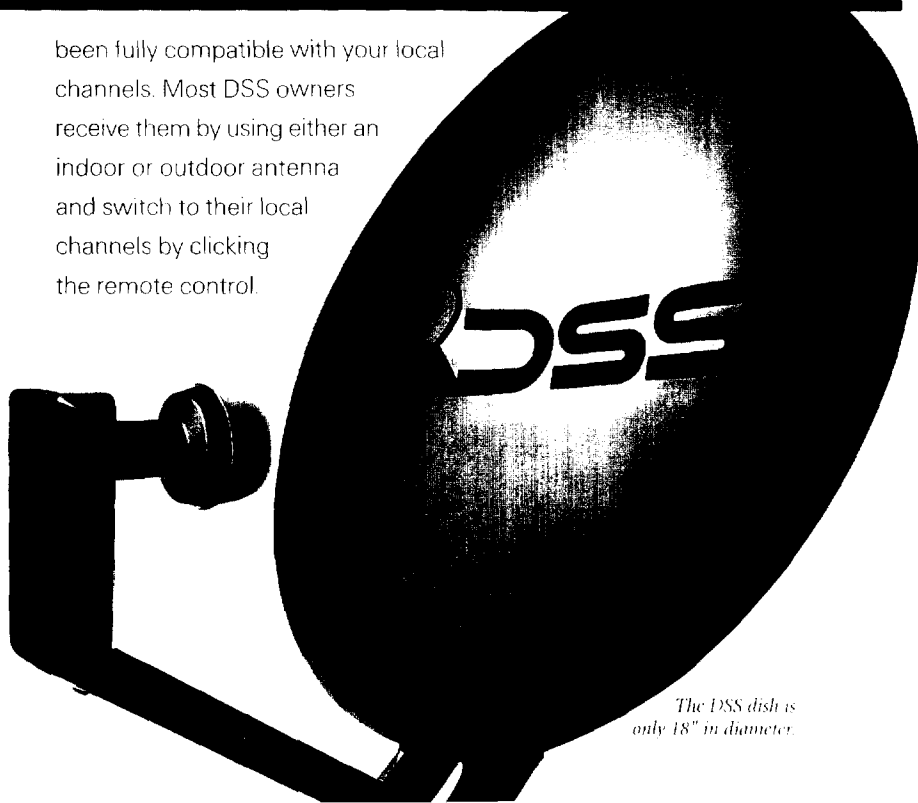


The DSS system is already the leading mini-dish system. And it's the only mini-dish system manufactured by proven and trusted companies like RCA, Sony, Panasonic, Magnavox, Toshiba, Hitachi, Uniden, Memorex, GE, ProScan, and Hughes Network Systems.

**Tap the full potential of your TV.**

**asting and DIRECTV.  
DSS system – they bring  
of movies, sports, news  
e history of television.**

been fully compatible with your local channels. Most DSS owners receive them by using either an indoor or outdoor antenna and switch to their local channels by clicking the remote control.



*The DSS dish is only 18" in diameter.*

# What to look for when buying a satellite dish.

## SO NOW YOU KNOW



about a new kind of technology and a selection of programming that's unprecedented in television history. The next step is to

experience it for yourself. Here are the answers to the most commonly asked questions that might help when you visit your local electronics or satellite retailer.

### **Q. If I already have cable, why should I buy the DSS system?**

**A.** You'll get everything you've had before, plus a lot more. All in digital picture and sound. And, quite frankly, the DSS system is a better value.

### **Q. I still want to watch my local channels. Is that a problem if I have the DSS system?**

**A.** No problem. With the touch of a button on your remote, you can switch over from the DSS system to your local

stations. Ask your retailer to suggest the best indoor or outdoor antenna to receive your local channels. Recent technology has made antenna quality better than ever. And remember, with an antenna, you get your local channels for free.

### **Q. Once I have the DSS system, will I be able to pick and choose the channels I want?**

**A.** Yes. The DSS system is the only subscription television service anywhere with two different programming companies to choose from. USSB and

DIRECTV offer an unprecedented array of packages at various prices. So you can be sure you'll find the combination of channels that best match your interests and budget.

### **Q. Can I watch USSB and DIRECTV on more than one TV set?**

**A.** Yes. You can run an additional line from the receiver to your other TVs. To watch different satellite channels on different TVs, simply add an additional DSS receiver as you would with a second VCR. And you can do so when you buy the dish or at a later date.

### **Still have questions?**

Visit our websites at [www.ussb.com](http://www.ussb.com) or [www.directv.com](http://www.directv.com). Or talk to a friend. You're bound to know someone who already owns a DSS system.

Then, visit your local electronics or satellite retailer. There are over 28,000 locations throughout the country to choose from. You can even buy DSS from AT&T.

And remember to ask about your Free Month of USSB.



## EXPERIENCE DSS FOR YOURSELF AT YOUR LOCAL RETAILER:

CIRCUIT CITY  
SEARS  
BEST BUY

RADIO SHACK  
MONTGOMERY WARD

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**EXHIBIT B**

**U.S. SATELLITE BROADCASTING ADVERTISEMENT**

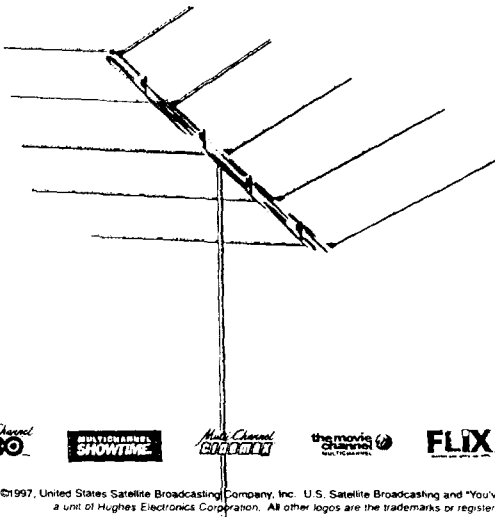
# Owners of this



# can see their

# local channels free

# with this



Contrary to what you may have heard, the 18" DSS® system has always been fully compatible with local channels offering consumers a seamless way to enjoy their local programming.

In fact, the majority of DSS system owners receive their local channels by using an indoor or outdoor antenna which allows them to switch to their local channels by simply clicking the remote control A/B switch.

So whether it's choosing from over 900 different movies a month from the most popular commercial-free movie channels on U.S. Satellite Broadcasting,<sup>SM</sup> or the widest selection of sports, news and information, and pay-per-view movies on DIRECTV,<sup>®</sup> the DSS system is about giving consumers the power to choose.



## U.S. Satellite Broadcasting

You've Never Seen Movies Like This.<sup>SM</sup>

[www.ussb.com](http://www.ussb.com)

*Multi-Channel*  
**HBO**

**SHOWTIME**

*Multi-Channel*  
**SHOWTIME**

*the movie*  
**CHANNEL**

**FLIX**

*sundance*  
**channel**

**HBO**  
FAMILY

*Lifetime*  
TELEVISION NETWORK

**ESPN**

**ESPN2**

**ESPN3**

**ESPN4**

**ESPN5**

**ESPN6**

**ALL NEWS**

**ESPN7**

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**EXHIBIT C**

**PRIMETIME 24'S ADVERTISEMENTS**

ABC, CBS, NBC, and FOX Channels are available only for homes (1) which cannot receive an acceptable picture from local ABC, CBS, NBC, and FOX affiliates via a conventional rooftop antenna, and (2) which have not subscribed to cable television within the last 90 days.

DO YOUR CUSTOMERS KNOW  
THEY CAN GET THE NETWORKS  
ON THEIR DBS SYSTEM?



DO YOU?

## PRIME TIME 24—THE CONNECTION TO THE NETWORKS

Don't miss out on a big DBS sale because you're unsure about the programming. Network television is a top programming concern with potential DBS dish customers and now you can tell them with confidence that it's available to them in the quality. With Prime Time 24's network affiliates, your DBS customers won't miss one minute of their favorite prime-time programs, daytime soaps, evening news and seasonal sports on East and West Coast feeds.

They'll get great regional variety from 6 great network affiliates: KOMO - ABC Seattle, KPIN - CBS San Francisco, KNBC - NBC Los Angeles, WNBC - NBC New York, WJLA - ABC Washington, D.C. and WRM - CBS Raleigh, plus FOX NL, the national FOX signal. And they'll enjoy the convenience of both Eastern and Pacific viewing times.

Close more sales—let your customers know about Prime Time 24. We're America's Network Connection. Coast to Coast.



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All CBS, NBC and FOX®  
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Don't miss out on a big DBS sale because you're unsure about the programming. Network television is a top programming concern with potential DBS dish customers and now you can tell them with confidence that it's available to them in the quality. With Prime Time 24's network affiliates, your DBS customers won't miss one minute of their favorite prime-time programs, daytime soaps, evening news and seasonal sports on East and West Coast feeds.



"It's a deal.  
You'll watch Frasier at nine and I'll watch  
Home Improvement at twelve."

"With PT East and PT West  
it's simple."



Watch Frasier on Eastern/Central time.



&



Watch Home Improvement on Pacific time.

Great things happen when East and West work together and PrimeTime 24 proves it, with our PT East/PT West combo. And now PrimeTime 24 is the only provider of programming on Eastern/Central time and Pacific time. If you qualify\*, you'll get your favorite prime time shows like Frasier and Home Improvement, twice a night, at two different times, so you can "time shift." Plus you get these other great combo benefits:

- 5 Great cities on two coasts—New York, Los Angeles, San Francisco, Seattle and Raleigh.
- More sports—the NBA and college basketball from both coasts.

- More syndicated shows, soaps and talk shows to choose from.
- Crystal clear signal and our commitment to preemption-free network programming.

**SAVE 24%**

**ADD PT WEST TO PT EAST OR  
PT EAST TO PT WEST NOW!**

**CALL US AT  
1-800-883-PT24.**

Or call any of the many distributors who carry PT East and PT West in their packages for other special prices!

\*ABC, CBS, NBC and FOX Channels are only available: (1) for private home viewing; (2) to households that cannot receive an acceptable off-air picture with the use of a conventional rooftop antenna; and (3) in households that have not received that network by cable television within the last 90 days.



America's Network Connection  
Coast To Coast